



Benjamin H. Zieman, Esq.  
856-393-2345  
bzieman@andersonshahlaw.com  
Fax: 856-528-1700

July 8, 2021

**VIA REGULAR MAIL**

Honorable Joseph H. Rodriguez, U.S.D.J.  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets, Courtroom 5D  
Camden, NJ 08101

**RE: Doe v. Small, et al.**  
**Docket No. 1:21-cv-11189-JHR-AMD**

Dear Judge Rodriguez,

We represent Defendants, the Atlantic City Board of Education, former Superintendent Paul A. Spaventa, and current Superintendent Barry Caldwell, in the above-referenced matter. By close of business today, we intend to move to dismiss most of the claims in the complaint pursuant to Fed. R. Civ. P. 12(b)(6). Given both the number and the complexity of the legal issues presented in this case, however, we respectfully request permission to file a brief that is two (2) pages longer than permitted under Local Civil Rule 7.2(b). Counsel for Plaintiff has consented to this request, and we would reciprocate should he require additional pages for his opposition brief.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me directly at 856-393-2371.

Respectfully submitted,

ANDERSON & SHAH LLC

By: s/ Benjamin H. Zieman  
Benjamin H. Zieman, Esq.

cc: Terrell A. Ratliff, Esq. (via CM/ECF)  
Jeffrey L. Shanaberger, Esq. (via CM/ECF)

**Anderson & Shah, LLC**

457 Haddonfield Road, Suite 120, Cherry Hill, NJ 08002 | P: (856) 393-2345 | F: (856) 528-1700 | [andersonshahlaw.com](http://andersonshahlaw.com)